

**DECLARATION OF  
STEPHEN A.  
BROOME IN  
SUPPORT OF  
MOTION TO  
EXCLUDE EXPERT  
OPINIONS OF  
BRUCE SCHNEIER**

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*Counsel for Defendant Google LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et.al*, individually and  
on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF STEPHEN A.  
BROOME IN SUPPORT OF MOTION TO  
EXCLUDE EXPERT OPINIONS OF  
BRUCE SCHNEIER**

Judge: Hon. Yvonne Gonzalez Rogers  
Date: September 20, 2022  
Time: 2:00 p.m.  
Location: Courtroom 1 – 4th Floor

1 I, Stephen A. Broome, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel  
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I submit  
4 this declaration in support of Google’s Motion to Exclude Expert Opinions of Bruce Schneier. I  
5 make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness,  
6 I could and would testify competently thereto.

7 2. Attached hereto as **Exhibit 1** is a true and correct copy of the transcript of the  
8 deposition of Bruce Schneier, taken in this litigation on July 18, 2022 (“Schneier Deposition”).

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of the document marked as  
10 Exhibit 3 at the Schneier Deposition.

11 4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the transcript  
12 of the deposition of Ramin Halavati, taken in this litigation on January 18, 2022.

13  
14 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
15 and correct. Executed in Los Angeles, California on August 5, 2022.

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18 By /s/ Stephen A. Broome  
19 Stephen A. Broome  
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